

May 14, 2025

VIA ECF

Honorable Michael E. Farbiarz  
United States District Judge  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Newark, New Jersey 07101

**Re: *Khalil v. Trump, et al.*, No. 2:25-cv-1963 (MEF) (MAH)**

Dear Judge Farbiarz:

Petitioner respectfully writes to provide notice of further supplemental authorities relevant to the Court's consideration of Petitioner's motions, particularly his motion for release. First, today in the case of Dr. Badar Khan Suri, a Georgetown post-doctoral Fellow arrested, detained and charged with removability pursuant to the Foreign Policy Ground, 8 U.S.C. § 1227(a)(4)(C), the Eastern District of Virginia ordered him immediately released from custody in Texas, without travel restrictions or GPS monitoring. *Khan Suri v. Trump*, 25-cv-0480, Dkt. 65 (E.D. Va. May 14, 2025) (attached as Exhibit A). Petitioner previously submitted the *Khan Suri* district court's May 6 decision denying the government's motion to dismiss. *See* ECF 237-2.

Second, Petitioner submits a supplemental Order on Release in the *Mahdawi* case, 25-cv-0389, Dkt 65 (D. Vt. May 14, 2025) (attached at Exhibit B), which authorized Mr. Mahdawi to travel to New York from "on or about May 15, 2025" to "on or about May 25, 2025" to attend Columbia University graduation ceremonies, and otherwise permitting him "to move freely and conduct his daily activities normally."

Respectfully submitted,

/s/ Baher Azmy

AMERICAN CIVIL LIBERTIES UNION OF NEW  
JERSEY FOUNDATION  
Jeanne LoCicero  
Farrin R. Anello  
Molly K.C. Linhorst  
570 Broad Street, 11th Floor  
Newark, New Jersey 07102  
973-854-1715

NEW YORK CIVIL LIBERTIES UNION  
FOUNDATION  
Amy Belsher\*  
Robert Hodgson\*  
Veronica Salama\*  
Molly Biklen\*

CENTER FOR CONSTITUTIONAL RIGHTS  
Baher Azmy  
Samah Sisay\*  
Diala Shamas\*  
666 Broadway, 7th Floor  
New York, NY 10012  
Tel: (212) 614-6464

CLEAR PROJECT  
MAIN STREET LEGAL SERVICES, INC.  
Ramzi Kassem\*  
Naz Ahmad  
Mudassar Toppa\*  
Shezza Abboushi Dallal\*  
CUNY School of Law

125 Broad Street, 19th Floor  
New York, N.Y. 10004  
Tel: (212) 607-3300

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
Omar Jadwat  
Noor Zafar\*  
Sidra Mahfooz\*  
Brian Hauss\*  
Esha Bhandari\*  
Vera Eidelman\*  
Tyler Takemoto\*  
Brett Max Kaufman\*  
125 Broad Street, 18th Floor  
New York, NY 10004  
Tel: (212) 549-2500

2 Court Square  
Long Island City, NY 11101  
Tel: (718) 340-4558

WASHINGTON SQUARE LEGAL SERVICES, INC.  
Alina Das\*  
Immigrant Rights Clinic  
245 Sullivan Street, 5th Floor  
New York, New York 10012  
Tel: (212) 998-6430

DRATEL & LEWIS  
Amy E. Greer  
29 Broadway, Suite 1412  
New York, NY 10006  
Tel: (212) 732-8805  
Fax: (212) 571-3792

VAN DER HOUT LLP  
Marc Van Der Hout (CA Bar #80778)\*  
Johnny Sinodis (CA Bar #290402)\*  
Oona Cahill (CA Bar #354525)\*  
360 Post St., Suite 800  
San Francisco, CA 94108  
Tel: (415) 981-3000  
Fax: (415) 981-3003

\* *Appearing Pro hac vice*

*Counsel for Petitioner*